

1 William L. Buus (SBN 180059)
2 *wbuus@buuslaw.com*
3 BUUS LAW GROUP APC
3 Pointe Drive, Suite 110
3 Brea, CA 92821
4 Telephone: (949) 825-6140
4 Facsimile: (949) 825-6141

5 Attorneys for Plaintiffs
6 WINGSAIL HOLDINGS, LLC and
6 YUNFEI "KRISTY" BAI

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 WINGSAIL HOLDINGS, LLC, a
12 Washington Corporation, and YUNFEI
12 "KRISTY" BAI, an individual,

13 Plaintiffs,

14 vs.

15 ANDREW POLSKY, an individual, and
16 SEFED, a California Corporation, and
16 DOES 1 through 10,

17 Defendants.

18
19 Case No.: 8:23-CV-02398-JWH-DFM
20 } SUPPLEMENTAL DECLARATION
21 } OF WILLIAM L. BUUS IN SUPPORT
22 } OF PLAINTIFFS' EX PARTE
23 } APPLICATION TO CONTINUE
24 } TRIAL AND RELATED DATES AND
25 } DEADLINES
26 }
27 }

19 I, William L. Buus, declare and state as follows:

20 1. I am an attorney licensed to practice law before all courts of the State
21 of California, as well as the United States District Court, Central District of
22 California, and I am presently counsel of record for plaintiffs herein, WINGSAIL
23 HOLDINGS, LLC and YUNFEI "KRISTY" BAI. I have personal knowledge of
24 the following facts and, if called as a witness, could and would competently testify
25 thereto. I submit this supplemental declaration in support of Plaintiff's ex parte
26 application to continue trial and extend related dates and deadlines to address
27 evidence and argument raised by Defendants in opposition to the application.

28 2. As I previously mentioned, I substituted as Plaintiffs' counsel of

1 record herein on May 21, 2025. While I cannot speak to the diligence of counsel
2 who preceded me, at all times, I acted diligently in reviewing the case file and
3 determining what is needed to prepare the case for settlement discussions and/or
4 trial. In that review, I noticed that the case was not at issue and that Plaintiffs have
5 therefore not been given a reasonable opportunity to conduct discovery into the
6 denials, affirmative defenses, and whatever other additional matter Defendants
7 choose to include in their answer to the complaint. As it stands, Plaintiffs will not
8 be able to conduct any of that discovery. Defendants have not addressed the
9 inherent unfairness of that and apparently desire that Defendants not have that
10 opportunity at all. Simply put, that would not be just and would be unduly
11 prejudicial to Plaintiffs.

12 3. As to the date of Defendant Andrew Polsky's deposition, I
13 communicated with counsel for Defendants about that in June of 2025, and he
14 provided dates of his and his client's availability. The only date that was offered
15 that did not conflict with any other work obligations was July 22nd, even though I
16 was scheduled to take a vacation that week. So, I was left with the choice of
17 scheduling it for that day or not scheduling it at all and taking the risk that it may
18 not ever be taken. I chose to protect my client's rights, even if it is potentially
19 inconvenient to me personally.

20 4. As to Defendants' argument that I appeared on behalf of Plaintiffs,
21 knowing the present trial date and, therefore, have voluntarily assumed the conflict
22 risk, I simply tried to make myself available to litigants to a lawsuit who needed
23 my help. If the Court does not believe that my calendar conflict is sufficient to
24 warrant a continuance of trial, I understand that. But given the other circumstances
25 explained in the ex parte application and this declaration, I believe good cause

26 ///

27 ///

28 ///

1 exists for a short, three and one-half month long continuance of trial and extension
2 of related dates and deadlines.

3 I declare under penalty of perjury under the laws of the United States of
4 America that the foregoing is true and correct. Executed on July 16, 2025, at Brea,
5 California.

6 /s/ William L. Buus
7

8 William L. Buus
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen (18) years and am not a party to the within action. My business address is that of 3 Pointe Drive, Suite 110, Brea, California 92821.

I hereby certify that on July 16, 2025, I electronically filed the foregoing SUPPLEMENTAL DECLARATION OF WILLIAM L. BUUS IN SUPPORT OF PLAINTIFFS' EX PARTE APPLICATION TO CONTINUE TRIAL AND RELATED DATES AND DEADLINES with the Clerk of the Court using ECF which will send notification and a copy of such filing to the following persons:

Alejandro S. Angulo, Esq.
aangulo@rutan.com
Joelle Leib, Esq.
jleib@rutan.com
RUTAN & TUCKER, LLP
18575 Jamboree Road, 9th Floor
Irvine, California 92612
Tel.: 714-641-5100
Fax: 714-546-9035

Attorneys for Defendants ANDREW POLSKY and SEFED

Executed on July 16, 2025, at Brea, California. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ William L. Buus